
Privacy Policy

CF Global Trading, L.L.C. and its Affiliates (collectively “CF Global” or “we”) understand that our clients’ privacy is important and we are committed to maintaining their confidentiality. The following disclosure explains our policy regarding non-public information and the process we have in place to protect our clients’ privacy and the confidential information we receive from our clients.

We collect non-public information about clients and counterparties from various sources (“Personal Data”), which include the following:

- Information we receive on applications and other forms (such as name, address, e-mail address, telephone number, Social Security Number, assets and income);
- Information about our clients’ financial transactions with us or others; and
- Information that we received from non-affiliated third parties (such as credit rating agencies) or other entities who may service our clients’ accounts from time to time.

We may use our clients’ information in order to operate our business in a prudent manner in accordance with industry standards and applicable law, which may include servicing and maintaining accounts and transactions, offering a broad range of services and products, verifying income and assets, responding to inquiries and requests, preventing fraud, monitoring and archiving communications and verifying our clients’ identity in accordance with the USA PATRIOT Act.

We do not disclose any non-public information to any non-affiliated third parties other than as permitted by law. We may disclose or share non-public information about our clients to our affiliates or third parties involved in servicing our clients’ accounts. We do not otherwise provide information about our clients to outside firms, organizations or individuals except to our attorneys, accountants and auditors and as permitted by law. We will, however, release information about our client if directed to do so by such client or if compelled or required to do so by law or self-regulatory organization (“SRO”) regulations.

We restrict access to our clients’ information to those employees who need to know such information to provide products or services to our clients. We maintain physical, electronic and procedural safeguards to guard and protect all clients’ information from unauthorized access, accidental or intentional manipulation, loss and destruction. Employees who violate these policies are subject to disciplinary action, including termination. Our clients’ information is secure and is not shared with a third party unless such third party is involved in servicing our clients’ relationship with CF Global or as required, in limited situations, by law or SRO regulations.

CHOICES AND ACCESS

If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt-out by contacting your client relationship manager, primary point of contact or email: CFGTCCompliance@cfglobal.com. Please note we will still send you important administrative and service or transaction-related messages, which you cannot opt out of.

How individuals can access, change or suppress their Personal Data: If you would like to request a review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact CFGTCCompliance@cfglobal.com. We will respond to your request consistent with applicable law. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that we may need to retain certain information for recordkeeping and regulatory purposes. Additional Information for the EEA: You also retain the right to complain to a supervisory authority in the EEA competent for your relevant country or region.

RETENTION PERIOD: We will retain Personal Data for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with our client and service their account(s); (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of applicable statutes of limitations, or regulatory investigations.

JURISDICTION AND CROSS-BORDER TRANSFER: Personal Data may be stored and processed in any country where we engage service providers to provide services to our client’s account(s). In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Personal Data. Transfer may also be made pursuant to contracts in your interest or at your request. Additional Information for the EEA: Where personal data is sent to third parties or service providers in countries outside the EEA, we ensure they have adequate level of data protection according to EEA standards.

SENSITIVE INFORMATION: We do not typically collect sensitive Personal Data in connection with the Services. Please do not send us any Personal Data which would be categorized as special data under GDPR (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership).

Summary & Disclosure of Business Continuity Plan

CF Global has prepared, and has always maintained a current Business Continuity Plan (“BCP”) in compliance with Financial Industry Regulatory Authority (“FINRA”) Rule 4370. This document outlines our plans to continue our business and meet our existing obligations to our clients in the event of a significant business disruption (“SBD”). Our BCP is summarized below:



CF Global's policy is to respond to a SBD by safeguarding our employees' lives and our property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of our books and records and allowing our clients to transact business. We will make every reasonable effort to meet our obligations to our clients at all times. We have in place a BCP that outlines essential parts of our business and discusses in detail:

- (1) Data back-up and recovery (hard copy and electronic);
- (2) All mission critical systems;
- (3) Financial and operational assessments;
- (4) Alternate communications between our clients and us;
- (5) Alternate communications between our employees and us;
- (6) Alternate physical location of our employees;
- (7) Critical business constituents, banks, and counter-party impact;
- (8) Regulatory reporting;
- (9) Communications with regulators; and
- (10) How CF Global shall assure our clients' prompt access to their funds and securities (if applicable) in the event that we determine that we are unable to continue our business.

During the time that CF Global may not be in operation, we shall provide alternative contact information to our clients via our website at www.cfglobal.com in order to effect transactions and for any other required client activity. In the event you are unable to reach us via the information provided on our website or by calling us at 212.888.4711 please contact our clearing firm Merrill Lynch, Pierce, Fenner and Smith Incorporated (Broadcorn) at 646.743.0110.

Customer Identification Program

To help the U.S. government fight the funding of terrorism and money laundering activities, Federal law requires all U.S. financial institutions, such as CF Global, to obtain, verify and record information that identifies each individual or institution that establishes a customer relationship with such financial institutions.

If a client enters into a customer relationship with CF Global, which includes opening an account at CF Global, we will request certain financial and legal information about such client, including such client's legal name, tax identification number and address, and the identity of any individuals with any authority or control over such client. We also verify such information to the extent required as follows:

- Taking steps to check the information provided – to verify that the clients are who they say they are.
- Consult applicable governmental agency lists of known or suspected criminals, terrorists and terrorist organizations to determine if anyone on any such list is attempting to open or maintain an account.
- Conduct, in certain instances, additional due diligence when accounts are opened for foreign persons, institutions or other clients.

The U.S. Department of the Treasury, U.S. Securities and Exchange Commission (the "SEC") and FINRA rules already require clients to provide most of this information.

If a client refuses to provide the information requested or a client's identity cannot be verified, CF Global may not be able to establish or maintain a business relationship with such client. If such client has already established a relationship with CF Global, we may have to terminate such relationship. If a client establishes a relationship with CF Global and refuses to provide this information, we may be required to report such refusal to appropriate governmental authorities.

Notice: Pursuant to U.S. regulations issued under section 311 of the USA PATRIOT Act, 31 CFR 103.192

We are prohibited from opening or maintaining a correspondent account for, or on behalf of the "Specified Institutions" or Jurisdictions of Primary Money Laundering Concern. (<https://www.fincen.gov/resources/statutes-and-regulations/311-special-measures>). The regulations also require us to notify you that your correspondent account with our financial institution may not be used to provide the Specified Institutions with access to our financial institution. If we become aware that the Specified Institutions are indirectly using the correspondent account you hold at our financial institution, we will be required to take appropriate steps to prevent such access, including terminating your account.

Monthly / Quarterly Statements

Unless you specifically request monthly/quarterly statements, you will be presumed to have waived any requirement by CF Global to provide you with such statements. Should your firm require such statements, please contact CF Global's Compliance Department at 212.888.4673.

Options Disclosure

Options involve risk and are not suitable for all investors. Before trading options read the [Characteristics & Risks of Standardized Options booklet](http://www.theocc.com/). (external link to <http://www.theocc.com/>)

SEC Rule 606 Order Routing Disclosure

SEC Rule 606 requires all brokers and dealers to make publicly available for each calendar quarter a report on its routing of non-directed orders in national market system securities during that quarter. The reports must identify the significant venues to which clients' orders were routed for execution during the applicable quarter and disclose certain aspects of the broker or dealer's relationship with such venues.

Furthermore, pursuant to SEC Rule 606(b), at the request of any of our clients, we will provide to such requesting client information regarding the identity of the venue to which such requesting client's orders were routed for execution in the six (6) months prior to such request, whether such orders were directed orders or non-directed orders and the time of the transactions, if any, that resulted from such

orders. Should you require such information, please send an email to CFGTCcompliance@cfglobal.com with a subject line of "Rule 606 Request" and all pertinent information necessary to identify the order(s) subject to the request.

Customer Complaints

Any customer complaint should be forwarded to CF Global's Chief Compliance Officer via email at CFGTCcompliance@cfglobal.com or via telephone at 212.888.4673. Physical mail in relation to these items should be directed to: CF Global Trading, L.L.C., Attn: Compliance, 60 East 42nd Street, Suite 1455 New York, NY 10165.

FINRA Broker Check

FINRA Rule 2267 requires CF Global to provide information about FINRA's BrokerCheck program. An investor brochure that includes information describing the BrokerCheck program may be obtained from FINRA. The FINRA BrokerCheck hotline number is (800) 289-9999. The FINRA website address is <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>.

SIPC Disclosure

CF Global is a member of the Securities Investor Protection ("SIPC"). Information about account protection coverage provided by SIPC can be obtained by visiting their website at www.sipc.org. The telephone number is 202-371-8300.

Notice to Canadian Clients Under National Instrument 31-103

Pursuant to the international dealer registration exemption in National Instrument 31-103, the Company is informing you of the following:

- CF Global Trading LLC (the "Company") is not registered in Canada and is advising you, its client, in reliance upon an exemption from the dealer registration requirement under National Instrument 31-103.
- The below list contains CFGT's agent for service of process for each applicable province:
Borden Ladner Gervais LLP (Laurie J. Cook)
4400 - 40 King Street West
Scotia Plaza
Toronto, Ontario
M5H 3Y4
Borden Ladner Gervais LLP (Jonathan L. Doll)
Centennial Place, East Tower
1900, 520 – 3rd Ave S W
Calgary, AB, Canada
T2P 0R3
- Clients may have some difficulty in enforcing any legal rights they may have against the Company because the Company is resident outside Canada and all or a substantial portion of its assets are situated outside Canada. The Company is not fully subject to the requirements of the *Securities Act* and the regulations thereunder concerning proficiency, capital, insurance, record keeping, segregation of funds and securities, statements of account and portfolio, and conflicts of interest.

Extended Hours Trading Risk Disclosure

You should consider the following points before engaging in extended hours trading. "Extended hours trading" means trading outside of regular trading hours." "Regular trading hours" generally means the time between 9:30 a.m. and 4:00 p.m. Eastern Standard Time.

Risk of Lower Liquidity: Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity in extended hours trading as compared to regular trading hours. As a result, your order may only be partially executed, or not at all.

Risk of Higher Volatility: Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular trading hours. As a result, your order may only be partially executed, or not at all, or you may receive an inferior price when engaging in extended hours trading than you would during regular trading hours.

Risk of Changing Prices: The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular Trading hours, or upon the opening the next morning. As a result, you may receive an inferior price when engaging in extended hours trading than you would during regular trading hours.

Risk of Unlinked Markets: Depending on the extended hours trading system or the time of day, the prices displayed on a particular Extended hours trading system may not reflect the prices in other concurrently operating extended hours trading systems dealing in the same securities. Accordingly, you may receive an inferior price in one extended hours trading system than you would in another extended hours trading system.

Risk of News Announcements: Normally, issuers make news announcements that may affect the price of their securities after regular trading hours. Similarly, important financial information is frequently announced outside of regular trading hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.

Risk of Wider Spreads: The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.